

MARTIN R. BADER (*Pro hac vice*)
mbader@sheppardmullin.com
JESSE A. SALEN (*Pro hac vice*)
jsalen@sheppardmullin.com
SHEPPARD, MULLIN, RICHTER & HAMPTON LLP
12275 El Camino Real, Suite 100
San Diego, California 92130-4092
Telephone: 858.720.8900

PATRICK MCGILL (*Pro hac vice*)
patrick@mcgillco.com
MCGILL & CO., P.C.
5580 La Jolla Blvd, Suite 39
La Jolla, CA 92037
Tel: (619) 974-8886

Nathan D. Thomas (USB #11965)
Elizabeth M. Butler (USB #13658)
PARSONS BEHLE & LATIMER
201 South Main Street, Suite 1800
Salt Lake City, Utah 84111
Telephone: (801) 532-1234
nthomas@parsonsbehle.com
lbutler@parsonsbehle.com

Attorneys for Defendant BlendJet Inc.

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH, CENTRAL DIVISION

BLENDTEC INC., a Utah corporation,
Plaintiff,

v.

BLENDJET INC., a Delaware Corporation,
Defendant.

**JOINT AND STIPULATED MOTION
FOR EXTENSION OF TIME FOR
DEFENDANT TO RESPOND TO
PLAINTIFF'S MOTION TO
CONSOLIDATE**

Case No. 2:21-cv-00668-TC-DBP

Judge Tena Campbell
Magistrate Judge Dustin B. Pead

Plaintiff Blendtec Inc. (“Plaintiff”) and defendant BlendJet Inc. (“Defendant”), by and through their undersigned counsel, hereby stipulate and jointly move the Court for an order extending Defendant’s time to respond to Plaintiff’s Motion to Consolidate [Dkt. No.200] (the “Motion”).

Defendant’s response to the Motion is presently due on March 6, 2025. The Motion seeks to consolidate the above-captioned action (the “2021 Action”) with the newly filed matter entitled *Blendtec, Inc. v. BlendJet, Inc., et al.*, Case No. 2:25cv-00096-DBP, brought by Plaintiff against Defendant BlendJet as well as additional parties (the “2025 Action”). Defendant BlendJet requested three (3) additional weeks to respond to the Motion and to coordinate its representation in the 2025 Action. Plaintiff’s counsel agreed. Accordingly, for good cause appearing, the parties jointly hereby move the Court for an order extending the deadline for Defendant to respond to the Motion to **March 27, 2025**. A proposed order is attached hereto.

Submitted this 6th day of March 2025.

/s/ Nathan D. Thomas

**SHEPPARD, MULLIN, RICHTER &
HAMPTON LLP**

Martin R. Bader (*pro hac vice*)

Jesse A. Salen (*pro hac vice*)

MCGILL & CO., P.C.

Patrick McGill (*pro hac vice*)

PARSONS BEHLE & LATIMER

Nathan D. Thomas (USB #11965)

Elizabeth M. Butler (USB #13658)

Attorneys for Defendant

/s/ Tamara Kapaloski

(signed by Nathan Thomas with permission
via electronic mail dated March 6, 2025)

DORSEY & WHITNEY LLP.

Brett Foster

Tamara Kapaloski

111 South Main Street, Suite 2100

Salt Lake City, Utah 84111

Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that, on this 6th day of March 2025, that a true and correct copy of the foregoing has been filed with the Clerk of Court, by using the CM/ECF system to deliver a true and correct copy of the foregoing to the following:

Brett Foster
Tamara Kapaloski
DORSEY & WHITNEY LLP
111 S. Main St., Suite 2100
Salt Lake City, UT 84111
Tel.: (801) 933-7360
foster.brett@dorsey.com
kapaloski.tammy@dorsey.com
Attorneys for Plaintiff Blendtec

/s/ Nathan D. Thomas